

Supplemental Declaration of Amy Fly on Behalf of Marcus White

My name is Amy Fly. I am an attorney who is licensed to practice in the state of Pennsylvania. On April 20, 2020, I spoke with Marcus White (Bookin#19056720), a detainee in the Dallas County Jail. He provided me with the following information:

1. Mr. White is currently detained on the fifth floor of the North Tower in the West Wing, Dorm 4.
2. On April 19, 2020, at 8:55pm, an officer holding a camera came to Mr. White's dorm and recorded a male nurse with an Australian accent taking Mr. White's temperature, checking his heart rate, and asking for his symptoms. Mr. White told him he had been having sore throat, shortness of breath, nasal congestion and diarrhea since March 25, 2020 and that he has not received any kind of treatment for any of those symptoms. The nurse left without treating Mr. White.
3. At around 11:20pm the same night, the officer with the camera and the nurse returned and asked Mr. White to step out of his dorm. Again, the officer recorded the nurse taking Mr. White's temperature, checking his heart rate, and asking for his symptoms. Mr. White repeatedly asked why he was being recorded, why no one else in his dorm was being checked, and why he was just now being treated at 11:20pm after a month of receiving no treatment for the same symptoms. Each time, the nurse tried to accuse Mr. White of refusing medical treatment. Mr. White clarified that he was not refusing treatment – indeed he stated he wanted all the medical help he could get.
4. Around 12:30am, the officer came on the intercom and asked Mr. White to step out of his dorm for a third time. Again, the officer recorded a nurse, this time a female African American nurse, taking Mr. White's temperature, checking his heart rate, and asking for his symptoms. She gave him Tylenol and medication for his sore throat. This was the first time Mr. White received any treatment for his symptoms. He asked this nurse the same questions – why was he being recorded and why hasn't he been given any treatment after testing positive for the coronavirus. The officer recording the encounter took a step backward and said “none of the officers who worked down here were notified.”
5. During all three interactions, no one was wearing a mask. At one point, the officer filmed a nurse giving Mr. White a mask. But when the officer turned off the camera, they took the mask back.

I declare under the penalty of perjury that the foregoing is true and correct. I have read this declaration to Mr. Bailey and he confirmed its accuracy.

April 20, 2020
York, PA

/s/Amy Fly
Amy Fly